

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

VERLIE A. FREEBURG,)	
)	
Plaintiff)	
)	Civil Action – Law
vs.)	
)	No. 05-67E
ELK REGIONAL MEDICAL CENTER,)	
)	
Defendant)	

MOTION TO EXTEND DISCOVERY AND OTHER DEADLINES

AND NOW comes Defendant, Elk Regional Health Center (the “Health Center”), by and through its attorneys, Cohen & Grigsby, P.C., and files the following Motion to Extend Discovery and Other Deadlines, and in support thereof, avers as follows:

1. On February 25, 2005, Plaintiff filed a Complaint alleging that the Health Center discriminated against her on the basis of her age and purported disability in violation of the Age Discrimination in Employment Act (“ADEA”) and Americans with Disabilities Act (“ADA”). Plaintiff filed an Amended Complaint on April 4, 2005. The Health Center filed its Answer and Defenses on April 27, 2005.

2. On June 15, 2005, the Court entered a Case Management Order setting forth discovery and other deadlines. The Court directed the parties to conclude all discovery by October 17, 2005.

3. The parties are in the process of concluding discovery, but have been unable to schedule Plaintiff’s deposition at a time convenient for all parties and counsel prior to the October 17, 2005 deadline.

4. The parties have scheduled Plaintiff’s deposition for October 24, 2005.

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5. Defendant requests this Honorable Court to extend the deadline for discovery and all other deadlines set forth in the Case Management Order by thirty (30) days. The parties expect to complete all necessary discovery within this thirty (30) day period.

6. Plaintiff consents to the filing of this motion.

WHEREFORE, Defendant, Elk Regional Health Center, requests that this Honorable Court extend the dates set forth in the June 15, 2005 Case Management Order by thirty (30) days.

Respectfully submitted,

COHEN & GRIGSBY, P.C.

By: 
W. Scott Hardy, Esquire
PA ID. No. 79225

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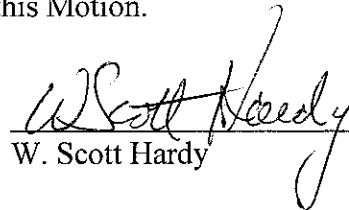
Counsel for Defendant
Elk Regional Health Center

Dated: October 12, 2005

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LOCAL RULE 16.1.2.F CERTIFICATION

I, W. Scott Hardy, counsel for Defendant Elk Regional Health Center, certify, pursuant to Rule 16.1.2.F of the Local Rules of the United States District Court for the Western District of Pennsylvania, that I have conferred with Plaintiff's counsel with respect to the matters set forth in this Motion and all parties consent to the filing of this Motion.



W. Scott Hardy

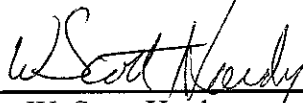
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Motion to Extend Discovery and Other Deadlines was served via United States First Class Mail, Postage Prepaid on the 12th day of October, 2005, upon the following:

Jerome J. Kaharick, Esq.
Michael Csonka, Esq.
Jerome J. Kaharick and Associates
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Suites 301 and 302
406 Main Street
Johnstown, Pennsylvania 15901

(Counsel for Plaintiff Verlie A. Freeburg)



W. Scott Hardy